

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	CASE NO.: 24-10788-AMC
)	
Bige Monyea Chambers,)	
)	
Debtor)	CHAPTER 13

**OBJECTION OF ALLY BANK
TO CONFIRMATION OF DEBTOR'S PROPOSED AMENDED PLAN**

Ally Bank ("ALLY"), by and through its attorneys, Lavin, Cedrone, Graver, Boyd & DiSipio, files **Objection to Confirmation of Debtor's Proposed Amended Plan** and states:

1. On February 13, 2020, Debtor Bige Monyea Chambers and Codebtor Christina Lolley Chambers, entered into a Retail Installment Sales Contract in the principal amount of \$78,090.91 (the "Contract") that referred and related to the purchase of a 2018 MASERATI LEVANTE, V.I.N. ZN661YUS5JX273346 (the "Motor Vehicle").
2. The interest rate under the Contract is 6.7830% *per annum*.
3. ALLY is the assignee of the Contract.
4. To secure the Contract, Debtor Bige Monyea Chambers and Codebtor Christina Lolley Chambers granted a first lien on the Motor Vehicle in favor of ALLY.
5. On March 07, 2024, Debtor filed a Voluntary Petition under Chapter 13 of the United States Bankruptcy Code.
6. On April 09, 2024, Debtor filed a Proposed Amended Plan (the "Plan").
7. The Chapter 13 Trustee has scheduled a Meeting of Creditors for June 05, 2024.
8. The plan lists the amount of the claim at \$15,668.00 at 0.00% interest.
9. As of the March 07, 2024, the balance on Ally Bank Total claim was \$33,985.40.
10. A proposed 0.000% interest rate is inconsistent with Till v. SCS Credit Corp., 541 U.S. 405 (2004).
11. The fair market value for the Motor Vehicle is \$74,050.00. See attached Exhibit C.

12. ALLY is entitled to a secured claim of \$33,985.40 at 10.50% interest over the life of the plan.
13. For the foregoing reasons, ALLY objects to confirmation of the Plan.

WHEREFORE **Ally Bank**, respectfully requests this Honorable Court to deny confirmation of the Plan.

Respectfully submitted,

Lavin, Cedrone, Graver, Boyd & DiSipio

BY: /s/ Regina Cohen

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Dated: April 30, 2024